

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action: 6:23cv00054
)	
THE CITY OF LYNCHBURG, <i>et al.</i> ,)	
)	
Defendants.)	

MOTION FOR PROTECTIVE ORDER

Defendants City of Lynchburg, Officer Seth Reed, Deputy Zachary Miller, and Officer Robbin Miller, by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, move the Court for entry of the attached protective order. In support thereof, Defendants state as follows:

1. On December 13, 2023, the parties held a Rule 26(f) conference. During the conference, Defendants' counsel discussed the need for a protective order with Plaintiffs' counsel. The parties agreed it "appear[ed] necessary for a protective order to be entered to protect the confidentiality of certain documents and/or things anticipated to be requested in discovery" and that Defendants' counsel would submit a proposed protective order. (Rule 26(f) Report at ¶ 7, ECF No. 19.)

2. Counsel for the parties have agreed on the form of the attached Protective Order.

WHEREFORE, Defendants respectfully request that the Court enter the attached protective order.

CITY OF LYNCHBURG, SETH REED,
ZACHARY MILLER, and ROBBIN MILLER

By /s/ John R. Fitzgerald
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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of December, 2023, I electronically filed the foregoing
with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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